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# IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Proceeding	91220335
Party	Defendant Luvanis S.A.
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Submission	Answer
Filer's Name	John L. Welch
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Date	03/03/2015
Attachments	91220335 Answer.pdf(56614 bytes )

## IN THE UNITED STATES PATENT AND TRADEMARK OFFICE BEFORE THE TRADEMARK TRIAL AND APPEAL BOARD

Charles B.H. James and Louise D.B. James,	
,	)
Opposers,	, )
	) Opposition No.
v.	) 91220335
Luvanis S.A.,	) Application S.N.
	) 86/279620
Applicant.	) CHARLES JAMES
	)

### **ANSWER**

Applicant Luvanis S.A., by its counsel, responds as follows to the NOTICE OF OPPOSITION filed herein.

- 1. Denied.
- 2. Applicant lacks sufficient knowledge to form a belief as to the truth of the allegations of paragraph 2 of the Notice of Opposition, and therefore denies same.
- 3. Applicant lacks sufficient knowledge to form a belief as to the truth of the allegations of paragraph 3 of the Notice of Opposition, and therefore denies same.
- 4. Applicant lacks sufficient knowledge to form a belief as to the truth of the allegations of paragraph 4 of the Notice of Opposition, and therefore denies same.
- 5. Applicant lacks sufficient knowledge to form a belief as to the truth of the allegations of paragraph 5 of the Notice of Opposition, and therefore denies same.
- 6. Applicant lacks sufficient knowledge to form a belief as to the truth of the allegations of paragraph 6 of the Notice of Opposition, and therefore denies same.

- 7. Applicant lacks sufficient knowledge to form a belief as to the truth of the allegations of paragraph 7 of the Notice of Opposition, and therefore denies same.
- 8. Applicant lacks sufficient knowledge to form a belief as to the truth of the allegations of paragraph 8 of the Notice of Opposition, and therefore denies same.
- 9. Applicant lacks sufficient knowledge to form a belief as to the truth of the allegations of paragraph 9 of the Notice of Opposition, and therefore denies same.
- 10. Applicant lacks sufficient knowledge to form a belief as to the truth of the allegations of paragraph 10 of the Notice of Opposition, and therefore denies same.
- 11. Applicant lacks sufficient knowledge to form a belief as to the truth of the allegations of paragraph 11 of the Notice of Opposition, and therefore denies same.
- 12. Applicant lacks sufficient knowledge to form a belief as to the truth of the allegations of paragraph 12 of the Notice of Opposition, and therefore denies same.
  - 13. Admitted.
  - 14. Admitted.
  - 15. Denied
  - 16. Denied
- 17. Admitted that the opposers are not associated with Applicant or its activities in connection with its mark CHARLES JAMES. Otherwise denied.
  - 18. Denied.
  - 19. Denied.
  - 20. Denied
  - 21. Denied.
  - 22. Denied.

#### 23. Denied.

WHEREFORE, Applicant prays that the Notice of Opposition be dismissed and that judgment be entered in its favor.

Luvanis S.A.

John L. Welch. Lando & Anastasi, LLP One Main Street, Eleventh Floor Cambridge, MA 02142 Tel. 617/395-7000

John L. Welch

### CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was served upon opposer this 3rd day of March, 2015, by mailing a copy thereof via first-class mail, postage pre-paid, to their counsel, Mark Lerner, Esq., Satterlee Stephens Burke & Burke LLP, 230 Park Avenue, New York, New York 10169.

John L. Welch

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